

1 A. River North Correctional Center.

2 Q. During what period of time did you work
3 at River North Correctional Center?

4 A. From November the 10th to July 1st I
5 retired.

6 Q. So is that July the 1st of 2023?

7 A. Yes.

8 Q. All right. When you say you retired,
9 from what entity did you retire?

10 A. From River North at -- I mean...

11 Q. Were you a VDOC employee?

12 A. Yes, I was.

13 Q. Okay. So that's the -- when I say
14 "VDOC," I'm referring to the Virginia Department of
15 Corrections. Is that the organization from -- from
16 which you retired?

17 A. Yes.

18 Q. All right. How many years did you have
19 with VDOC?

20 A. It was a couple months shy of 24.

21 Q. Were there very -- a variety of times in
22 which you could retire? Like, for instance, could
23 you retire at 20, anytime after 20 up through 30?
24 Were -- were there any rules like that when you
25 retired?

1 intellectual growth?

2 MS. WALLACE: Form.

3 THE WITNESS: No, sir, I didn't.

4 BY MR. KRUDYS:

5 Q. What -- we've heard some people talk
6 about him operating at a -- like a fourth, fifth --
7 four-, five- or six-year-old.

8 What -- what age category would you say
9 that Mr. Givens operated at?

10 MS. WALLACE: Form.

11 MR. BELL: Object to the form.

12 THE WITNESS: Probably that level.

13 BY MR. KRUDYS:

14 Q. Four-, five- or six-year-old?

15 A. Uh-huh.

16 Q. I'm not going to intrude in -- in terms
17 of your own personal circumstances, I just want to
18 know about your -- do you have any children? Did
19 you ever have any children?

20 A. No, I did not.

21 Q. Okay. All right. But a four-, five- or
22 six-year-old, that's like a child that is just
23 about beginning kindergarten; isn't that right?
24 You understand that?

25 A. Yes. Yes.

1 Q. All right. And what -- where did you see
2 it with those two officers?

3 MS. WALLACE: Form.

4 THE WITNESS: Once at the prison, and
5 then once of the Wytheville office of
6 president -- or Investigator O'Dell.

7 BY MR. KRUDYS:

8 Q. Have you ever taken a polygraph
9 concerning Mr. Givens' death?

10 MR. BELL: Object to the form.

11 THE WITNESS: No, sir.

12 BY MR. KRUDYS:

13 Q. Have you -- have the Virginia State
14 Police asked you to take a polygraph?

15 A. No, sir.

16 Q. Did anybody ask you, other than your
17 lawyer, to take a polygraph?

18 MS. WALLACE: Form.

19 THE WITNESS: Yes, sir.

20 BY MR. KRUDYS:

21 Q. Who is it that asked you to take a
22 polygraph?

23 A. O'Dell.

24 Q. Okay. And why did you decline to take
25 the polygraph?